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 8 BRIT UW LIMITED  
 (sued as "Certain Underwriters at Lloyd's  
 Under Policy No. B0146LDUSA701030")  
 9

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12

13 WILLIAM AMBROSIO, *et al.*,

CASE NO. 3:11-cv-04956-RS

14 Plaintiffs,

15 v.

16 CERTAIN UNDERWRITERS AT LLOYD'S  
 UNDER POLICY NO.  
 17 B0146LDUSA0701030 and DOES 1 through  
 100, inclusive,

**JOINT STIPULATION (1) TO RELATE  
 CASES PURSUANT TO CIVIL L.R. 3-12,  
 AND (2) FOR ORDER ESTABLISHING  
 BRIEFING SCHEDULE AND HEARING  
 DATE RELATING TO DEFENDANTS'  
 MOTIONS TO DISMISS AND MOTIONS  
 TO STRIKE**

18 Defendants.

19  
 20 MICHAEL ALVARADO, *et al.*,

CASE NO. 3:11-cv-04957-RS

21 Plaintiffs,

22 v.

23 CERTAIN UNDERWRITERS AT  
 LLOYD'S UNDER POLICY NO.  
 24 B0146LDUSA0701030, and DOES 1-100,  
 inclusive,

25 Defendants.

<p>1 WILLIAM JAMISON, <i>et al.</i>,</p> <p>2 Plaintiffs,</p> <p>3 v.</p> <p>4 CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.</p> <p>5 B0146LDUSA0701030 and DOES 1 through 100, inclusive,</p> <p>6 Defendants.</p>	CASE NO. 3:11-cv-04958-RS
<p>7 WOOD RIVER CAPITAL RESOURCES, 8 LLC, <i>et al.</i>,</p> <p>9 Plaintiffs,</p> <p>10 v.</p> <p>11 CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.</p> <p>12 B0146LDUSA0701030 and DOES 1 through 100,</p> <p>13 Defendants.</p>	CASE NO. 3:11-cv-5759-MEJ
<p>14 HENRY JAMES ANDERSON, <i>et al.</i></p> <p>15 Plaintiffs,</p> <p>16 v.</p> <p>17 CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.</p> <p>18 B0146LDUSA0701030 and DOES 1 through 100, inclusive,</p> <p>19 Defendants.</p>	CASE NO. 3:11-cv-5760-EDL
<p>20 ROSEVILLE CAPITAL RESOURCES, 21 LLC; <i>et al.</i>,</p> <p>22 Plaintiffs,</p> <p>23 v.</p> <p>24 CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.</p> <p>25 B0146LDUSA0701030 and DOES 1 through 100, inclusive,</p> <p>26 Defendants.</p>	CASE NO. 4:11-cv-5761-DMR

1 Plaintiffs William Ambrosio, *et al.*, Case Number 3:11-cv-04956-RS, by and through  
 2 their counsel of record, George Donaldson, Esq. from the Law Office of George Donaldson;

3 Plaintiffs Michael Alvarado, *et al.*, Case Number 3:11-cv-04957-RS, by and through their  
 4 counsel of record, Jeffrey A. Feldman, Esq. from the Law Offices of Jeffrey A. Feldman;

5 Plaintiffs William Jamison, *et al.*, Case Number 3:11-cv-04958-RS, by and through their  
 6 counsel of record, Val Hornstein, Esq. from the Hornstein Law Offices;

7 Plaintiffs Wood River Capital Resources, LLC, *et al.*, Case Number 3:11-cv-05759-MEJ,  
 8 by and through their counsel of record, Jeffery J. Swanson, Esq. from the Law Offices of Jeffery  
 9 J. Swanson;

10 Plaintiffs Henry James Anderson, *et al.*, Case Number 3:11-cv-5760-EDL, by and  
 11 through their counsel of record, Richard S. Miller, Esq. from the Law Offices of Richard S.  
 12 Miller;

13 Plaintiffs Roseville Capital Resources, LLC, *et al.*, Case Number 4:11-cv-5761-DMR, by  
 14 and through their counsel of record, Troy A. Thielemann, Esq. from Cappello & Noel LLP; and

15 Defendant Brit UW Limited (“Brit”), Case Numbers 3:11-cv-04956-RS; 3:11-cv-04957-  
 16 RS; 3:11-cv-04958-RS; 3:11-cv-05759-MEJ; 3:11-cv-5760-EDL; and 4:11-cv-5761-DMR, by  
 17 and through its counsel of record, Michael L. Fox, Esq. of Sedgwick LLP, hereby stipulate as  
 18 follows:

19 The three actions filed by Plaintiffs William Ambrosio, *et al.*, Michael Alvarado, *et al.*,  
 20 and William Jamison, *et al.* (collectively “the Related Cases”) have been deemed related and are  
 21 pending before the Honorable Richard Seeborg because all three concern substantially the same  
 22 parties, events and request for relief, so assignment to separate judges would have involved  
 23 unnecessary duplication of labor, cost and conflicting results. (ECF No. 13 in Case No. 3:11-cv-  
 24 04956-RS.)

25 Similarly, the three actions filed by Plaintiffs Wood River Capital Resources, LLC, *et al.*,  
 26 Henry James Anderson, *et al.*, and Roseville Capital Resources, LLC, *et al.* (collectively “the  
 27 New Cases”) were removed to the Northern District of California on November 30, 2011. All  
 28

1 three of the New Cases concern substantially the same parties, events and request for relief as  
2 each of the other New Cases and the Related Cases. Therefore, assignment to separate judges  
3 would involve unnecessary duplication of labor, cost and conflicting results.

4 Therefore, the parties, by and through their counsel of record, stipulate that the New  
5 Cases should be related to each other and to the Related Cases, with the earliest filed case,  
6 pursuant to Civil L.R. 3-12.

7 Brit has already filed Motions to Dismiss pursuant to Federal Rule of Civil Procedure  
8 12(b)(6) and Motions to Strike pursuant to Federal Rule of Civil Procedure 12(f) in the Related  
9 Cases, and those motions are currently set for hearing on January 5, 2012, at 1:30 p.m. (ECF No.  
10 15 in Case No. 3:11-cv-04956-RS.) Brit anticipates filing similar motions in the New Cases no  
11 later than December 7, 2011.

12 Plaintiffs and Brit desire to establish a single hearing date relating to Defendants'  
13 Motions to Dismiss and Motions to Strike filed in the New Cases and the Related Cases, and to  
14 establish a revised briefing schedule relating thereto, including the filing of coordinated and/or  
15 joint opposition papers by Plaintiffs, to the extent possible, in order to eliminate unnecessary  
16 duplication of labor and cost. The Court previously modified the briefing schedule and hearing  
17 date in the Related Cases (ECF No. 15 in Case No. 3:11-cv-04956-RS), but further modification  
18 should have no effect on the schedule for the cases.

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1           Therefore, the parties, by and through their counsel of record, further stipulate, subject to  
 2 the Court's approval, that (1) Brit shall file its Motions to Dismiss and Motions to Strike in the  
 3 New Cases no later than December 7, 2011; (2) the hearing for the Motions to Dismiss and the  
 4 Motions to Strike filed in the six cases will be scheduled for February 2, 2012, at 1:30 p.m.; (3)  
 5 Plaintiffs' opposition papers to Brit's motions will be due January 3, 2012; and (4); and Brit's  
 6 reply papers will be due January 17, 2012.

7           IT SO STIPULATED.

8  
 9           DATED: December 2, 2011

SEDGWICK LLP

10           By: /s/ Michael L. Fox

11           Michael L. Fox  
 12           Attorneys for Defendant  
 13           BRIT UW LIMITED  
 14           (sued as "Certain Underwriters at Lloyd's  
 15           Under Policy No. B0146LDUSA701030")

16           DATED: December 2, 2011

Law Office of George Donaldson

17           By: /s/ George Donaldson

18           George Donaldson  
 19           Attorneys for Plaintiffs  
 20           William Ambrosio, *et al.*,  
 21           Case No. 3:11-cv-04956-RS

22           DATED: December 2, 2011

Hornstein Law Offices

23           By: /s/ Val Hornstein

24           Val Hornstein  
 25           Attorneys for Plaintiffs  
 26           William Jamison, *et al.*,  
 27           Case No. 3:11-cv-04958-RS

28           DATED: December 2, 2011

Law Offices of Jeffrey A. Feldman

29           By: /s/ Jeffrey A. Feldman

30           Jeffrey A. Feldman  
 31           Attorneys for Plaintiffs  
 32           Michael Alvarado, *et al.*,  
 33           Case No. 3:11-cv-04957-RS

1 DATED: December 2, 2011

Law Offices of Jeffery J. Swanson

2 By: /s/ Jeffery J. Swanson

3 Jeffery J. Swanson  
4 Attorneys for Plaintiffs  
5 Wood River Capital Resources, LLC, *et al.*,  
6 Case Number 3:11-cv-05759-MEJ

7 DATED: December 3, 2011

8 Law Offices of Richard S. Miller

9 By: /s/ Richard S. Miller

10 Richard S. Miller  
11 Attorneys for Plaintiffs  
12 Henry James Anderson, *et al.*,  
13 Case No. 3:11-cv-5760-EDL

14 DATED: December 2, 2011

15 Cappello & Noel LLP

16 By: /s/ Troy A. Thielemann

17 Troy A. Thielemann  
18 Attorneys for Plaintiffs  
19 Roseville Capital Resources, LLC, *et al.*,  
20 Case No. 4:11-cv-5761-DMR

21 PURSUANT TO STIPULATION, IT IS SO ORDERED

22 DATED: December 7, 2011

23 By:   
24 The Honorable Richard Seeborg  
25 U.S. District Judge, Northern District of California

Sedgwick LLP